



Nuclear Safety Enforcement Program Update and Case Review

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Overview



- Staffing/Activities
- Case Review
- Takeaways



Staffing / Activities



- Hiring Efforts
- Worked 13 Cases
- 11 Completed; 2 in progress
 - 4 PNOVs
 - 3 Consent Orders
 - 4 Enforcement Letters
- 2 Regulatory Assistance Reviews



Completed Cases



Contractor	Issue	Outcome
LANS	Unanticipated Extremity Exposures	PNOV
WRPS	Program Deficiencies	Consent Order
SRNS	Hand Puncture	PNOV
URS	SPRU Contamination	PNOV
SEC	RadCon Deficiencies (SPRU)	Enforcement Letter
EnergySolutions	RadCon Deficiencies (SPRU)	Enforcement Letter



Completed Cases



Contractor	Issue	Outcome
NSTec	Fire Seal QA Deficiencies	PNOV
URS	QA and Work Control Deficiencies	Consent Order
CWI	QA and Work Control Deficiencies	Enforcement Letter
BEA	ATR Reactor Vessel Draindown	Consent Order
WRPS	Positive USQ (Design Temp)	Enforcement Letter



Case Review



- Los Alamos (LANL) Extremity Exposure PNOV
- Nevada Device Assembly Facility Fire Seal PNOV
- Separations Process Research Unit (SPRU) Contamination Event PNOV
- Idaho Sodium Bearing Waste Treatment Project (SBWTP) Quality Assurance & Work Control Consent Order
- Idaho Advanced Test Reactor (ATR) Draindown Consent Order



LANL Extremity Exposure PNOV



- Significance: Potential for extremely high exposure
- Issues: Change Recognition
 - Inadequate engineering and administrative controls
 - Numerous deviations from procedures and hazards controls requirements
- Civil Penalty: \$82,500
- Mitigating Factors



DAF Fire Seal PNOV



- Significance: QA Program Breakdown Involving Safety-Class SSCs
- Issues: Multiple Management Deficiencies
 - Willful violation of work package requirements
 - Delayed recognition of significance
 - Poor extent-of-condition determination
- Civil Penalty: \$178,750
- Mitigating Factors



SPRU Contamination Event PNOV



- Significance: Potential for Co-located Worker and Public Impact
- Issues: Multiple, Fundamental Work Control and RadCon Program Deficiencies
 - Insufficient resources
 - Inadequate work instructions
 - Poor “awareness” of hazards
- Civil Penalty: \$412,500
- Mitigating Factors



SBWTP QA and Work Control Consent Order



- Significance: Potential Impact on Operations
- Issues: Recurrences of QA Concerns
 - Identified by DOE Idaho Operations Office
 - Weak subcontractor assurance system
 - Contractor Oversight of Subcontractor
- Monetary Remedy: \$112,500



ATR Vessel Draindown Consent Order



- Significance: Conduct of Operations at a Hazard Category 1 Nuclear Facility
- Issues: Extended Operator Inattention
 - Insufficient outage management resources
 - Poor communication of management expectations
 - Perceptions of low risk while shutdown
- Monetary Remedy: \$250,000
- Considerations
- Corrective Actions



Takeaways



- Multiple layers of defense needed to effectively address changing hazards
- QA programs need to be single failure tolerant
- The lowest bid may come with baggage
- Prime / sub-contractor relationship(s) may impact oversight effectiveness
- Senior managers plot the course, but others steer



Questions?